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**From:** Sean Bechta  
**Sent:** Tuesday, December 31, 2013 1:36 PM  
**To:** CEQA Guidelines  
**Subject:** Comment on CEQA Guidelines Update

Hi Chris (assuming that this ultimately reaches you).

Nice to have another bite at the apple regarding the Guidelines update. I did not have a chance to put together any comments the first time around...other than the call Gary and I gave you regarding posting an NOP with the County Clerk. By the way, thanks for including that in there.

So, while I have a few spare minutes, I do have one focused suggestion regarding the Appendix G checklist questions.

Ever since the questions were updated to include GHGs and Forestry resources, I have had issue with question II(c) (Agriculture and Forestry Resources).

“Conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production.”

My concern is that conflicting with zoning, or rezoning, does not necessarily result in an adverse environmental effect. For example, a parcel could be rezoned to a forestry zoning designation that is more protective of the resource than its current zoning. What would one check then in Appendix G checklist? Clearly the answer to “cause rezoning?” would be “yes”, but what does that mean relative to an environmental impact. Yes, one can “tell the story” that the rezoning is not actually an adverse effect, but why not attempt to avoid any confusion in the first place.

I would suggest borrowing language that is already in question X(b) (Land Use and Planning) “Conflict with any land use plan....adopted for the purpose of avoiding or mitigating an environmental effect.” Question X(b) already addresses the idea that a simple “paper conflict” with many plans and policies is not in and of itself an environmental effect.

I would suggest modifying question II(c) to say something along the lines of:

“Conflict with existing zoning for forest land, timberland, or timberland zoned Timberland Production intended to avoid or mitigate environmental effects, or rezone such lands to a zoning category less protective of forest/timber resources.”

Thanks,  
Sean